

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

FIRST-CLASS MAIL AND PERIODICALS
SERVICE STANDARD CHANGES, 2021

Docket No. N2021-1

NATIONAL POSTAL POLICY COUNCIL
INTERROGATORY TO UNITED STATES POSTAL SERVICE
WITNESS CURTIS WHITEMAN (USPS-T-2)
(May 19, 2021)

The National Postal Policy Council ("NPPC"), pursuant to §3020.117 of the Commission's rules of practice, respectfully submits the following interrogatory, number (NPPC/USPS-T2-1) to United States Postal Service witness Curtis Whiteman (USPS-T-2) and requests a timely answer under oath. If an interrogatory can be answered more accurately by a different witness, please redirect it to the appropriate witness.

Please contact the undersigned with any questions.

Respectfully submitted,

NATIONAL POSTAL POLICY COUNCIL

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NATIONAL POSTAL POLICY COUNCIL
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WITNESS CURTIS WHITEMAN (NPPC/USPS-T2-1)

NPPC/USPS-T2-1: Please refer to Page 14, lines 2-3, of your testimony, where you state: “The output of the costing models shows an expected decrease in annual cost of \$279.6 million.”

- a. Are the cost savings numbers of \$279.6 million as compared to an optimized baseline or a current state baseline?
- b. If the cost savings are against a current state baseline, did you perform any analysis showing what savings would be compared to an optimized current ground baseline? If so, please provide it.